

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:) **CHAPTER 13**
)
AMANDA LYNNE BOHANON) **CASE NO. 17-51130-WLH**
)
DEBTOR.)

**MOTION TO APPROVE SETTLEMENT AND FOR DEBOR TO RETAIN
SETTLEMENT PROCEEDS**

COMES NOW the Amanda Bohanon, by and through counsel, and shows this Court the following:

1.

The debtor filed the instant petition pursuant to Chapter 13 under the Bankruptcy Code on January 20, 2017. The case was confirmed on June 2, 2017.

2.

Debtor suffered a car accident on August 24, 2015, and suffered injuries.

3.

Debtor hired Georgia Trial Attorneys at Kirchen & Grant, LLC to settle a personal injury case as a result of the August 24, 2015 collision. On May 31, 2017, this court entered an order approving the employment of James Grant for this personal injury case. James Grant is employed with Georgia Trial Attorneys at Kirchen & Grant, LLC.

4.

Per the settlement, Exhibit A, Debtor is to receive \$32,673.92. The debtor would like to retain the funds to help pay for future medical bills and miscellaneous bills that have become due.

WHEREFORE, Debtor prays:

(a) For the entry of an Order approving the debtor's settlement and

- (b) allowing Georgia Trial Attorneys at Kirchen & Grant, LLC to disburse the debtor her settlement proceeds for the reimbursement for her injuries;
- (c) For such other relief as the Court deems just and proper.

This July 7, 2017.

Respectfully submitted,

/s_____
Brian S. Limbocker
Attorney for Debtor
2230 Towne Lake Parkway
Building 800, Ste. 140
Woodstock, GA 30189

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AMANDA LYNNE BOHANON) **CASE NO. 17-51130-WLH**
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DEBTOR.)

NOTICE OF ASSIGNMENT OF HEARING

PLEASE TAKE NOTICE that the above referenced Debtor has filed a Motion to Approve Settlement and to Retain Insurance Proceeds (“Motion”) and related papers with the Court seeking an order on the Motion.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Motion in Courtroom 1403, United States Courthouse, 75 Ted Turner Drive, S.W., Atlanta, Georgia, at 9:30 A.M on August 16th, 2017.

Your rights may be affected by the court’s ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk’s Office is Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

DATED THIS July 7, 2017.

/s_____
BRIAN S. LIMBOCKER
ATTORNEY FOR DEBTOR

Certificate of Service

I, the undersigned hereby certify that I am, and at all times mentioned was more than 18 years of age, and that on October 4, 2011, I served a true copy of the within and foregoing Motion to Retain Insurance Proceeds, upon the following:

Nancy J. Whaley
303 Peachtree Center Ave.
Suite 120
Atlanta, GA 30303

Amanda Bohanon
609 Sweet Bay Ridge
Woodstock, GA 30189

Kirchen & Grant, LLC
Attention: James Grant
3867 Holcomb Bridge Rd., Ste. 700
Norcross, GA 30092

And all of the creditors on the attached matrix.

This July 7, 2017.

/s_____
Brian S. Limbocker
Attorney for Debtor

Label Matrix for local noticing

113E-1

Case 17-51130-wlh

Northern District of Georgia

Atlanta

Fri Jul 7 14:27:40 EDT 2017

Caliber Home Loans, Inc.

13801 Wireless Way

Oklahoma City, OK 73134-2500

Amanda Lynne Bohanon

609 Sweet Bay Ridge

Woodstock, GA 30188-3311

(p)CITIBANK

PO BOX 790034

ST LOUIS MO 63179-0034

Comenity Bank/vctrssec

Po Box 182789

Columbus, OH 43218-2789

Department Store National Bank

c/o Quantum3 Group LLC

PO Box 657

Kirkland, WA 98083-0657

Abbey Ulsh Dreher

Barrett Daffin Frappier Levine & Block

Suite 100

4004 Belt Line Road

Addison, TX 75001-4320

Dsnb Macys

Po Box 8218

Mason, OH 45040-8218

(p)GEORGIA DEPARTMENT OF REVENUE

COMPLIANCE DIVISION

ARCS BANKRUPTCY

1800 CENTURY BLVD NE SUITE 9100

ATLANTA GA 30345-3202

James M Grant

Kirchen & Grant, LLC

Suite 700

3867 Holcomb Bridge Rd.

Norcross, GA 30092-2210

Internal Revenue Service

P.O. Box 7346

Philadelphia, PA 19101-7346

Kenny Bohanon

2011 Pine Forest Ct.

Jonesboro, GA 30236-5417

Brian S. Limbocker

Limbocker Law Firm, LLC

Bldg. 800 - Suite 140

2230 Towne Lake Parkway

Woodstock, GA 30189-5542

PRA Receivables Management, LLC

PO Box 41021

Norfolk, VA 23541-1021

Pinnacle Credit Services, LLC its successors

assigns as assignee of Cellco

Partnership d/b/a Verizon Wireless

Resurgent Capital Services, PO Box 10587

Greenville, SC 29603-0587

Pinnacle Credit Services, LLC its successors

assigns as assignee of Cellco Partnership

d/b/a Verizon, Resurgent

Capital Services, PO Box 10587

Greenville, SC 29603-0587

Pinnacle Llc/resurgent

Po Box 10497

Greenville, SC 29603-0497

(p)PORTFOLIO RECOVERY ASSOCIATES LLC

PO BOX 41067

NORFOLK VA 23541-1067

Quantum3 Group LLC as agent for

Comenity Bank

PO Box 788

Kirkland, WA 98083-0788

River Park Owners Association

River Park c/o Tolley Community Management

8295 Highway 92

Woodstock, GA 30189-6507

Sears/cbna

Po Box 6189

Sioux Falls, SD 57117-6189

State Collection Service, Inc.

2509 S. Stoughton Road

Madison, WI 53716-3314

State Collection Services

P.O. Box 1072

Wixom, MI 48393-1022

SunTrust Bank

Attn: Support Services

P.O. Box 85092

Richmond, VA 23286-0001

Suntrust Bank Atlanta

55 Park Pl Ne Ste 1055

Atlanta, GA 30303-2531

Synchrony Bank

c/o PRA Receivables Management, LLC

PO Box 41021

Norfolk, VA 23541-1021

Tolley Community Management

8295 GA-92

Woodstock, GA 30189

U. S. Attorney

600 Richard B. Russell Bldg.

75 Ted Turner Drive, SW

Atlanta GA 30303-3315

WellsStar

P.O. Box 3475

Toledo, OH 43607-0475

Nancy J. Whaley
Nancy J. Whaley
Standing Chapter 13 Trustee
303 Peachtree Center Avenue
Suite 120
Atlanta, GA 30303-1286

Ryan J. Williams
Nancy J. Whaley
Standing Chapter 13 Trustee
303 Peachtree Center Avenue
Suite 120
Atlanta, GA 30303-1286

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Cbna
50 Northwest Point Road
Elk Grove Village, IL 60007

Georgia Department of Revenue
P.O. Box 105499
Atlanta, GA 30348-5499

Portfolio Recovery Associates, LLC
POB 41067
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Caliber Home Loans, Inc.

End of Label Matrix	
Mailable recipients	31
Bypassed recipients	1
Total	32

Georgia Trial Attorneys at Kirchen & Grant

3867 Holcomb Bridge Road

Suite 700

Norcross, GA 30092

Telephone: 678-667-8965

Fax: 678-935-4329

6/23/2017

Amanda Bohanon

Invoice No.

2712

230 Wentworth Dr

Canton, GA 30114

Settlement Statement

Client Number: 845

Amanda Bohanon

Matter Number: 1861

Amanda Bohanon v Michelle Crawford

Total Funds Received per settlement order: \$116,438.91

LESS: Attorney Fees: The Law Offices of Kanner & Pintaluga \$27,739.82
Georgia Trial Attorneys at Kirchen & Grant \$11,073.15

LESS: Costs Incurred

<u>Date</u>	<u>Check No.</u>	<u>Description</u>	
		TLO search	\$2.00
		Facsimile Charges	\$1.75
		Facsimile Charges - LOP to Key Health	\$1.75
		Postage & Photocopies- offer to settle tort claim made pursuant to 33-7-11	\$12.04
		Plus CD certified: 7016 2140 0000 8039 5912	
		Facsimile Charges	\$3.50
		Closed File Fee	\$50.00
		K&P Costs	\$449.85

Total Costs Incurred: \$520.89

LESS: Letters of Protection

MedCare Solutions obo University Orthopedics (original bill - \$1,070.00)	\$481.13
Arrowhead Clinics, Inc. (original bill - \$6,845.00)	\$1,300.00
CP Healthcare obo American Health Imaging of Marietta (original bill - \$3,700.00)	\$2,200.00
Regional Medical Group (original bill - \$6,192.68)	\$4,000.00

Continued On Next Page

MedChex obo BenchMark Rehab	\$35,000.00
Partners, American Health Imaging of	
Canton, Atlanta Surgical Logistics	
(original bills - \$58,784.01)	
Key Health Medical Solutions obo	\$1,450.00
American Health Imaging (original bill -	
\$2,370.00)	
<hr/>	
Total Letters of Protection	\$44,431.13
<hr/>	
Total Amount to Client:	\$32,673.92

Accepted and Agreed this _____ day of June, 2017.

Bohanon, Amanda

Thank You For Your Business